Cullen, Pat@Waterboards

From: Trommer, Bob@Waterboards
Sent: Tuesday, November 04, 2014 9:12 AM
To: Cullen, Pat@Waterboards
Subject: FW: UNOCAL #5484, 18950 LAKE CHABOT RD., CASTRO VALLEY, GLOBAL ID T0600101453, USTCF CLAIM #6627, ACEH CASE #RO0000352

From: Nowell, Keith, Env. Health [mailto:Keith.Nowell@acgov.org]
Sent: Monday, November 03, 2014 3:10 PM
To: Trommer, Bob@Waterboards
Cc: Larson, Kirk@Waterboards; Roe, Dilan, Env. Health
Subject: UNOCAL #5484, 18950 LAKE CHABOT RD., CASTRO VALLEY, GLOBAL ID T0600101453, USTCF CLAIM #6627, ACEH CASE #RO0000352

Dear Mr. Trommer:

Alameda County Environmental Health (ACEH) has reviewed the *Draft Review Summary Report- Closure Preliminary Review- October 2014* (DRSR), prepared by the California State Water Resources Control Board (SWRCB) and the recently submitted document entitled *Focused Site Conceptual Model* (SCM) dated September 12, 2014 and prepared by AECOM for the subject site. ACEH agrees that this case appears close to closure; however, it is the opinion of ACEH that one data gap remains. The Responsible Party (RP) indicates that the nearest surface water body is the Almond Reservoir located 3080 feet west of the site, and the DRSR states the nearest surface water body is greater than 250 feet from the defined plume boundary. Data available to ACEH suggests that an open channel of Chabot Creek may be within 200 feet of the site in the cross- to down gradient direction. As groundwater beneath the site has been reported as shallow as 2.99 feet below the ground surface (bgs), ACEH is of the opinion that it is likely groundwater would intercept Chabot Creek if the creek is determined to be within 200 feet.

The most recent groundwater monitoring event, conducted on March 8, 2013, reported concentrations of total petroleum hydrocarbons as gasoline (TPHg), tertiary butyl alcohol (TBA) and 2-methylnaphthalene at 1,900 micrograms per liter (μg/L), 480 μg/L, and 25 μg/L, respectively, in the down gradient monitoring well MW-7. These concentrations are at least an order of magnitude above the Environmental Screening Levels (ESLs) protective of surface water-fresh water aquatic habitats (ESL Table F-2a) of 100 μg/L TPHg, 12 μg/L TBA, and 2.1 μg/L 2-methylnaphthalene. Additionally, concentrations of benzene, naphthalene, and methyl tertiary butyl ether (MTBE) were also reported to exceed ESLs protective of surface water-fresh water aquatic habitats.

The SCM states the closest section of Chabot Creek is over one-mile to the south and that the entire length of Chabot Creek that is downgradient of the site is in a culvert. ACEH is aware that the Alameda County Flood Control and Water Conservation District (ACFC&WD) has restored sections of Chabot Creek down gradient of the site to provide natural habitat. To date, the creek restoration project for the bioengineered naturalized stream channel has included removal of concrete channel and underground culvert sections.

It is the opinion of ACEH that the one remaining data gap for the subject fuel leak case is the location and status of the creek, including determining if there has been, or if there are plans for, stream-naturalization projects along the portion of the creek in the vicinity of the site. ACEH is preparing a directive to address this remaining data gap.

Please provide a date and time if you wish to discuss this case.

Thank you for this opportunity to respond.

Respectfully,
Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda , CA 94502-6540
phone: 510 / 567 - 6764
fax: 510 / 337 - 9335
email: keith.nowell@acgov.org

PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm